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7 Attorneys for Defendants  
NATIONAL INVESTMENT CONSULTANTS, INC., and  
8 WEI M. TSE a.k.a. RAYMOND TSE, and for Relief  
Defendant THERESA C. WONG,

**UNITED STATES DISTRICT COURT  
NORTHERN DIVISION OF CALIFORNIA  
SAN FRANCISCO DIVISION**

12 U.S. COMMODITY FUTURES TRADING  
13 COMMISSION and THE COMMISSIONER OF  
14 CORPORATIONS OF THE STATE OF  
CALIFORNIA.

15 Plaintiffs.

16 || vs

17 NATIONAL INVESTMENT CONSULTANTS,  
18 INC, a California corporation, PACIFIC BEST  
19 GROUP LTD, a.k.a. PACIFIC BEST  
COMPANY LTD, a British Virgin Islands  
Corporation, YI KERRY XU, an individual,  
RUN PING ZHOU a.k.a. FLORA ZHOU, an  
individual, and WEI M. TSE a.k.a. RAYMOND  
TSE, an individual,

**Defendants.**

24 and

25 THERESA C. WONG, an individual,

26 | Relief Defendant

CASE NO.: 052641 JSW

**STIPULATION AND [PROPOSED]  
ORDER EXTENDING TIME FOR  
SERVICE OF EXPERT WITNESS  
DISCLOSURES AND REPORTS**

(No Hearing Set/USDC Civil L.R.  
6-2)

**Judge:** Hon. Jeffrey S. White

## RECITALS

WHEREAS on November 3, 2005, the Court ordered disclosure of all expert witnesses and reports to be served by March 31, 2006;

WHEREAS on March 27, 2006, Defendants' expert witness, Gordon Rausser, advised that he was en route to testify at a trial in New York and that he expected the trial to last all week. Consequently, Mr. Rausser requested additional time in order to prepare his report;

WHEREAS counsel for Defendants has informed plaintiffs United States Commodity Futures Trading Commission and the Commissioner of Corporations for the State of California (hereinafter collectively “Plaintiffs”) of Mr. Rausser’s inability to complete his report by Friday March 31, 2006;

WHEREAS all parties through their counsel of record have agreed that disclosure of all expert witnesses and reports may be extended two weeks and may be served on or before April 14, 2006;

WHEREAS, granting the motion will not affect any hearings or proceedings on the Court's calendar and will not affect the schedule of this case;

WHEREAS, this court has ordered one prior time modification in this case Pursuant to Northern District Rule 6-3 and the parties have agreed to one prior time modification by stipulation.

## **STIPULATION**

The parties hereby agree and stipulate, subject to approval of this Court, that the parties shall have up to and including April 14, 2006, to serve their disclosure of expert witnesses and reports.

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1 Dated: March 26, 2006

THELEN REID & PRIEST LLP

2 By   
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4 EDWARD GARTENBERG  
5 ALEXANDRA EPAND  
6 ROBERT A. WEIKERT  
7 Attorneys for Defendants  
8 PACIFIC BEST GROUP LTD, a.k.a. PACIFIC BEST  
9 COMPANY LTD, NATIONAL INVESTMENT  
10 CONSULTANTS, INC.; WEI M. TSE a.k.a.  
11 RAYMOND TSE, and for Relief Defendant THERESA  
12 C. WONG

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Dated: March \_\_\_, 2006

U.S. COMMODITY FUTURES TRADING COMMISSION

By

KEVIN K. BATTEH  
JAMES H. HOLL, III  
ERIN E. VESPE  
Attorneys for Plaintiff  
U.S. COMMODITY FUTURES TRADING  
COMMISSION

Dated: March \_\_\_, 2006

COMMISSIONER OF CORPORATIONS OF THE STATE  
OF CALIFORNIA

By

WAYNE STRUMPFER  
ALAN S. WENGER  
EDWARD KELLY SHINNICK  
Attorneys for Plaintiff  
COMMISSIONER OF CORPORATIONS OF THE  
STATE OF CALIFORNIA

1 Dated: March \_\_, 2006

THELEN REID & PRIEST LLP

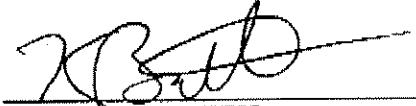
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EDWARD GARTENBERG  
ALEXANDRA EPAND  
ROBERT A. WEIKERT  
Attorneys for Defendants  
PACIFIC BEST GROUP LTD, a.k.a. PACIFIC BEST  
COMPANY LTD, NATIONAL INVESTMENT  
CONSULTANTS, INC.; WEI M. TSE a.k.a.  
RAYMOND TSE, and for Relief Defendant THERESA  
C. WONG

10  
11 Dated: March 28, 2006

U.S. COMMODITY FUTURES TRADING COMMISSION

12 By \_\_\_\_\_  
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KEVIN K. BATTEH  
JAMES H. HOLL, III  
ERIN E. VESPE  
Attorneys for Plaintiff  
U.S. COMMODITY FUTURES TRADING  
COMMISSION

20  
21 Dated: March \_\_, 2006

22 COMMISSIONER OF CORPORATIONS OF THE STATE  
23 OF CALIFORNIA

24 By \_\_\_\_\_  
25  
26  
27  
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WAYNE STRUMPFER  
ALAN S. WENGER  
EDWARD KELLY SHINNICK  
Attorneys for Plaintiff  
COMMISSIONER OF CORPORATIONS OF THE  
STATE OF CALIFORNIA

1 Dated: March \_\_\_, 2006

THELEN REID & PRIEST LLP

3 By \_\_\_\_\_

EDWARD GARTENBERG  
ALEXANDRA EPAND  
ROBERT A. WEIKERT  
Attorneys for Defendants  
PACIFIC BEST GROUP LTD, a.k.a. PACIFIC BEST  
COMPANY LTD, NATIONAL INVESTMENT  
CONSULTANTS, INC.; WEI M. TSE a.k.a.  
RAYMOND TSE, and for Relief Defendant THERESA  
C. WONG

10 Dated: March \_\_\_, 2006

U.S. COMMODITY FUTURES TRADING COMMISSION

13 By \_\_\_\_\_

KEVIN K. BATTEH  
JAMES H. HOLL, III  
ERIN E. VESPE  
Attorneys for Plaintiff  
U.S. COMMODITY FUTURES TRADING  
COMMISSION

18 Dated: March 28 2006

19 COMMISSIONER OF CORPORATIONS OF THE STATE  
OF CALIFORNIA

21 By \_\_\_\_\_

WAYNE STRUMPFER  
ALAN S. WENGER  
EDWARD KELLY SHINNICK  
Attorneys for Plaintiff  
COMMISSIONER OF CORPORATIONS OF THE  
STATE OF CALIFORNIA

1 Dated: March 27, 2006

COTTON & GUNDZIK, LLP

3 By \_\_\_\_\_  
4 JOHN W. COTTON  
5 Attorneys for Defendant  
6 YI KERRY XU

7 Dated: March \_\_\_, 2006

LAW OFFICES OF FRED S. KONIGSBERG

8  
9 By \_\_\_\_\_  
10 FRED S. KONIGSBERG  
11 Attorneys for Defendants  
12 RUN PING ZHOU aka FLORA ZHOU and  
13 SOUTH CHINA INVESTMENTS, INC.

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1 Dated: March \_\_, 2006

COTTON & GUNDZIK, LLP

2

3

By

JOHN W. COTTON  
Attorneys for Defendant  
YI KERRY XU

6

7

Dated: March \_\_, 2006

LAW OFFICES OF FRED S. KONIGSBERG

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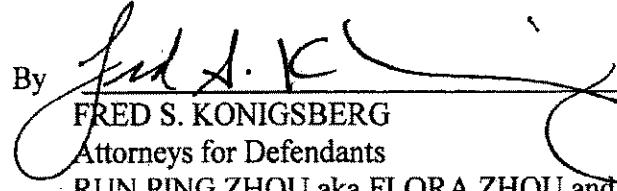
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By

  
FRED S. KONIGSBERG  
Attorneys for Defendants  
RUN PING ZHOU aka FLORA ZHOU and  
SOUTH CHINA INVESTMENTS, INC.

1                   **[PROPOSED] ORDER**  
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5                   Pursuant to Stipulation, the parties shall have up to and including April 14, 2006 to serve  
6                   their disclosure of expert witnesses and reports.  
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9                   **IT IS SO ORDERED.**  
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Dated: March 28, 2006

  
HONORABLE JEFFREY S. WHITE  
UNITED STATES DISTRICT COURT  
JUDGE